

**L. Ralph Dartez**  
Region Manager  
Gulf Coast Region

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*3/11/02*



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March 6, 2002

Department of the Interior  
Minerals Management Service  
Attn: Rules Processing Team, MS 4024  
381 Elden Street  
Herndon, Virginia 20170-4817

RE: Notice of Proposed Rulemaking  
Procedures for Dealing with Sustained Casing Pressure

Marathon Oil Company appreciates the opportunity to comment on the proposed rulemaking. We support the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

As noted in OOC's comments, we question what risks to the environment and personnel are posed by sustained casing pressure on subsea wells. We note that no instances of uncontrolled well flow are attributed to sustained casing pressure from subsea wells. Marathon supports a technical risk assessment approach and the formulation of a API Recommended Practice (RP) to address the potential problem. Marathon believes that this will be a more effective approach which will allow allocation of resources directly to potential unacceptable risk areas.

Secondly, Marathon believes the monitoring of additional annulus in subsea wells by the introduction of penetrations in the subsea wellhead and monitoring devices will increase the risk of uncontrolled flow as annuli with higher pressure could be communicated to annuli which are not designed to contain these pressures. Additionally, we are concerned that the proposed remediation would not just include the wellhead and subsea tree but also the flowlines, subsea manifolds, pipelines, control umbilicals and platform systems and that the reliability of all these systems may be compromised.

Thirdly, Marathon agrees with the OOC assessment that the cost to the industry would exceed \$100 MM on a yearly basis and that the rule should be classified as significant. More importantly, as stated above, Marathon does not believe this expenditure will reduce risk but rather increases the risk of uncontrolled flow.

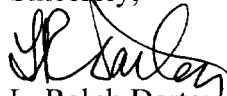
Marathon also agrees that due to the custom designed nature of hybrid wells, that they should be addressed individually through the DWOP process.

Even though we strongly recommend the above approach the OOC has provided alternative language on the proposed rulemaking for your consideration. Marathon has participated in the formulation of this alternative language and supports it as submitted.

Based on the above, Marathon requests that the proposed rule be withdrawn and that industry be allowed to provide a recommended practice which could be adopted into regulation.

We appreciate your careful consideration of all of the comments concerning this rulemaking. We have provided three printed copies of our comments. Please feel free to contact the undersigned at (713) 296-2230, if you have any questions concerning our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Ralph Dartez", written over the printed name.

L. Ralph Dartez  
Production Manager  
Gulf of Mexico Business Unit